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THE CITY OF NEW YORK  
**LAW DEPARTMENT**

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June 12, 2008

**BY HAND DELIVERY**

The Honorable Denise L. Cote  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**MEMO ENDORSED**

Re: Chris Mannah v. City of New York, et al.,  
08 CV 4750 (DLC)

Your Honor:

I am an Assistant Corporation Counsel in the Special Federal Litigation Division of the New York City Law Department and the attorney assigned to the defense of the above referenced matter. I write to respectfully request an enlargement of time from the present date until August 12, 2008, to answer or otherwise respond to plaintiff's complaint on behalf of defendants City of New York and Raymond Kelly.<sup>1</sup> This is defendants' first request for an enlargement of time to respond to plaintiff's complaint. Plaintiff's counsel, Leo Glickman, Esq., consents to this request.

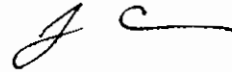
In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. Plaintiff appears to be alleging that, on or about September 12, 2005, he was arrested in the vicinity of Fifth Avenue and Eighth Street, New York, New York, while working as a taxi driver. As a result, plaintiff claims he was subject to false arrest, malicious prosecution, and excessive force. Accordingly, it is necessary for defendants to acquire as much information as possible concerning this matter in order to properly assess the case and respond to the complaint. To that end, this office is in the process of forwarding to plaintiff for execution a N.Y.C.P.L. §160.50 release so that we can access the sealed records from plaintiff's underlying criminal prosecution, including the criminal court file, the District Attorney's file, and even our own police records. In addition, to the extent plaintiff is claiming injuries resulting from the alleged incident, this office is also in the process

<sup>1</sup> Upon information and belief, defendants Theresa Shortell and John Batanus have not yet been served with process in this action.

of forwarding a HIPAA compliant medical release to plaintiff for his execution so that we may access his relevant medical records.

Accordingly, defendants City of New York and Raymond Kelly respectfully request that their time to respond to the complaint be extended to August 12, 2008. Thank you for your consideration of this request.

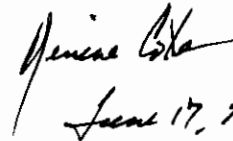
Respectfully submitted,



Jessica T. Cohen (JC 0044)  
Assistant Corporation Counsel

cc: Leo Glickman, Esq. (by first-class mail)  
Attorney for Plaintiff

*Granted.*



*June 17, 2008*

ECF NOTICE TO BE SENT TO:

Leo Glickman  
Stoll Glickman & Bellina, P.C>

COPIES MAILED TO:

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